1 Jeffrey L. Hartman, Esq. Nevada Bar No. 1607 2 HARTMAN & HARTMAN 510 W. Plumb Lane, Suite B 3 Reno, NV 89509 T: (775) 324-2800 4 F: (775) 324-1818 5 notices@bankruptcyreno.com Attorney for Christina Lovato, Trustee 6 7 8 9 In re

## UNITED STATES BANKRUPTCY COURT

## DISTRICT OF NEVADA

Case No.: 24-50792-hlb (Chapter 7) META MATERIALS INC., DECLARATION OF CHRISTINA W. Debtor. LOVATO IN SUPPORT OF EX PARTE APPLICATION FOR ORDER **AUTHORIZING EXPENDITURE** 

> Hearing Date: N/A Hearing Time:

FOR LITIGATION PURPOSES

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Christina W. Lovato, under penalty of perjury of the laws of the United States, declares:

- I am the duly appointed and acting trustee for the chapter 7 estate of Meta Materials, 1. Inc. I have personal knowledge of the matters stated herein.
- 2. As part of my investigation into the Meta pre-bankruptcy financial affairs, I have sought and obtained authority to employ contingency-fee litigation counsel with expertise in the area of market manipulation of publicly traded stock including, but not limited to, naked short selling and spoofing. Toward that end, and to fulfill my due-diligence obligations, through counsel I have commenced the Rule 2004 examination process and have issued subpoenas to brokers/traders.

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3	3.	My litigation counsel has recommended that the Meta Estate enter into an annual
subscrip	tion	service with Shareholder Intelligence Services, LLC ("ShareIntel") which provides
access an	nd ir	sight into broker-dealer, clearing firm and shareholder position movements.

- 4. ShareIntel can provide a broker-by-broker analysis of imbalances (potential counterfeit shares) of Meta shares which a broker has sold or purchased during the several years leading up to its chapter 7 petition.
- 5. ShareIntel's arrangements with its clients are in the form of a subscription service designed to meet the client's specific requirements for use in litigation and other types of analysis. The annual subscription fee is \$60,000.
- 6. The Meta Estate has adequate resources to pay the annual subscription fee. In the aggregate, the Meta accounts under my control hold in excess of \$1 million.

DATED: May 9, 2025.

/s/ Christina W. Lovato
Christina W. Lovato, Trustee